

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

DODORA UNIFIED COMMUNICATIONS,  
INC.,

Plaintiff,

V.

DIRECT INFORMATION PVT. LTD. and  
ANSWERABLE, INC.,

Defendants.

Civil Action No.  
05-10016-NMG

## **DEFENDANT'S PRELIMINARY PROPOSED EXHIBIT LIST**

The defendant, Direct Information Pvt. Ltd. (“Directi”) hereby submits this preliminary proposed exhibit list. Directi notes that there are certain documents that, it believes, the plaintiff, Dodora Unified Communications, Inc. (“Dodora”), has not yet produced and, in addition, documents from third party witnesses, including, without limitation, VeriSign, Inc. and Michael Bernstein and the Law Offices of Michael Bernstein, P.C., that have not yet been produced. Directi therefore reserves the right to supplement this list upon receipt of those or other documents. Directi also reserves the right to supplement this list based on any proposed exhibits, the plaintiff may submit.

1. 12-7-04 e-mail, Turakhia to Garraud (Garraud Exh. No. 1).
2. Documents from ICANN from its website, sufficient to show total domain name registrations through ICANN as of various dates, including, without limitation, January 1, 2003, July 1, 2003, January 1, 2004, May 31, 2004, June 30, 2004,

- December 31, 2004, and the month and date nearest to the trial (or the actual dates as of which ICANN's information is dated).
3. Spreadsheet of domain names received by Directi (Garraud Exh. No. 4).
  4. Dodora's motion for a temporary restraining order with attached affidavit of Mr. Garraud (Garraud Exh. No. 5).
  5. Agreement between Pool.com and WLS Registrar, Inc. (Garraud Exh. No. 8).
  6. Order appointing receiver (Garraud Exh. No. 9).
  7. Affidavit of Pool.com (Garraud Exh. No. 10).
  8. Bernstein time records, (Garraud Exh. No. 11).
  9. June 1, 2004 Letter, Newman & Newman, to VeriSign (Garraud Exh. No. 12).
  10. Agreements between Bernstein and Directi.
  11. August 16, 2004 Affidavit of Ronald Garraud (Garraud Exh. No. 15).
  12. Dodora's Application for a temporary restraining order or alternatively, motion to abate with affidavit of Mr. Garraud (Garraud Exh. No. 16).
  13. [Draft] Settlement Agreement and mutual releases (Garraud Exh. No. 19).
  14. Settlement Agreement (Garraud Exh. No. 20).
  15. Agreed Order Closing Receivership (Garraud Exh. No. 21).
  16. E-mails from Bernstein to Turakhia and Turakhia to Bernstein (Garraud Exh. No. 25).
  17. E-mail from Garraud to Turakhia, dated December 14, 2004 (Garraud Exh. No. 26).
  18. Dodora 2003 and 2004 financial information and, if available, 2005.
  19. E-mail from Helen to Directi with attached notice from Directi dated December 15, 2004.
  20. Letter, Bernstein to Turakhia, dated December 14, 2004.

21. Letter from Bernstein to ICANN, dated January 28, 2004 (ICANN 0014).
22. E-mail from Garraud to Bruce Whitehead (ICANN 0031).
23. August 21, 2004 e-mail, Garraud to Turakhia, et al (ICANN 0057-59).
24. VeriSign reports of transfer of domain names away from Dodora between June 15, 2004 to December 15, 2004.
25. VeriSign reports of all domain names redeemed between June 15, 2004 and December 15, 2004.
26. VeriSign information concerning funds Dodora had on account with it.
27. VeriSign records of payments received from June 2004 to December 2004.
28. VeriSign invoices to Dodora.
29. Total number of domain names across the VeriSign forty-five day audit renewal period between June and December 2004.
30. Invoices from ICANN to Dodora.
31. VeriSign invoices to Dodora.
32. Records of payments received by Michael Bernstein from Pool.com.
33. Records of payments received by Directi from Pool.com.
34. Records of payments made to VeriSign.
35. Docket sheet from Compana v. Dodora case.

Respectfully submitted,

DIRECT INFORMATION PVT. LTD.,

By its attorneys,

s/Dustin F. Hecker

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Dated: May 20, 2005

**CERTIFICATE OF SERVICE**

I, Dustin F. Hecker, hereby certify that on this 20<sup>th</sup> day of May, 2005, I caused a copy of the foregoing to be served by electronic mail, to: David Baker, Esq., 105 Union Wharf, Boston, Massachusetts 02109; and by facsimile to Michael S. Bernstein, Esq., Law Office of Michael Bernstein, P.C., 1301 Northwest Highway, Suite 204, Garland, Texas 75041-5861.

s/Dustin F. Hecker

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Dustin F. Hecker